

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***RESPONSE TO COMMENTS***

ON THE TITLE V DRAFT PERMIT V-04-004

Ebonite International, Incorporated

1813 West 7<sup>th</sup> Street

Hopkinsville, KY 42240

October 6, 2004

Chris Leslie, Reviewer

Plant I.D. #: 21-047-00054

Application Log #: 50734

**SOURCE DESCRIPTION:**

An operating permit application was received from Ebonite International, Incorporated on December 15, 1998 and was complete on March 16, 1999. The applicant proposes to operate a bowling ball manufacturing facility.

# ATTACHMENT A

## Response to Comments

Comments on Ebonite International, Incorporated Draft Title V Air Quality Permit submitted by Margaret Hickey, Environmental and Safety Manager.

### Permit Statement of Basis

1. Page 1, Source Description – In paragraph one, the verbiage “The MDI is stored in one storage tank outside of the facility and two storage tanks inside the facility and the polyol is stored in two tanks outside the facility.” should be changed to “The MDI is stored in two storage tanks inside the facility and the polyol is stored in two tanks outside the facility.” Also, the verbiage “...polyurethane core area, mixed with MEK peroxide, poured into the mold and allowed to cure and then sent to one of...” should be changed to “...polyurethane core area and poured into the mold and allowed to cure and then sent to one of...”.

*Division’s response: Comment acknowledged, change made.*

2. Page 1, Source Description – In paragraph two, the verbiage “...lathes...” should be changed to “...grinders...”.

*Division’s response: Comment acknowledged, change made.*

3. Page 2, Source Description – In paragraph four, the verbiage “...sent to storage. It should be noted that there are two polyurethane ball areas. One area is referred to as the polyurethane area and the other is referred to as the annex or urethane balls system 4. ...” should be changed to “...sent to storage. ...”.

*Division’s response: Comment acknowledged, change made.*

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4. Page 2, Group 01, Curing Ovens – The proposed plan is for the annex curing oven to replace the south curing oven. This would increase the capacity on each of the two ovens to 138 cores/hr.

*Division’s response: Comment acknowledged, change made.*

5. Page 2, Group 02, Material Transfer to Production – Company does not feel this is an acceptable emission unit because it represents the pipes that transfer the materials to the production areas and that it is completely enclosed and that the other areas of production are where emissions occur. The company feels that this point should be omitted.

*Division’s response: Comment acknowledged, change made.*

## Response to Comments (continued)

### **Title V Permit**

6. Page 2, Group 03, Large Core Pouring/Curing and Small Core Pouring/Curing – The company feels it would be easier if the maximum rated capacities were expressed on a per core basis.

*Division's response: The Division has revised the permit as requested by the source.*

7. Page 3, Emission Limitations, Compliance Demonstration Method – The company claims that the actual potential emissions of styrene is 55.77 tons/year, instead of 42.10 tons/year.

*Division's response: ISCST3 modeling was reperfomed using the rate 55.77 tons/year and boundary emission levels did not exceed the USEPA Region 9 Preliminary Remediation Goal. The Division has revised the permit as requested by the source.*

8. Page 5, Emission Limitations, Compliance Demonstration Method – The company claims that the actual maximum usage rate of methylene chloride is 33 tons/year.

*Division's response: ISCST3 modeling was reperfomed using the rate 33 tons /year and boundary emission levels did not exceed the USEPA Region 9 Preliminary Remediation Goal. The Division has revised the permit as requested by the source.*

9. Page 7, Group 05, Cold Metal Degreasers – The company claims that there are only two cold cleaning degreasers and that the maximum rated capacity on each should be 0.06 gal/hour.

*Division's response: The Division has revised the permit as requested by the source.*

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.